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Appl. No. 10/810,945
Amdt. Dated August 16, 2006
Reply to Office action of May 18, 2006

AUG 16 2006

REMARKS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action. Favorable reconsideration of the application is respectfully requested in view of the remarks and amendments made herein.

Claims 12-14, 23, and 24 were rejected under 35 U.S.C. 102(b) as being anticipated by Marshall et al. (U.S. Patent Application No. 2003/0031339). Traversal of this rejection is made for at least the following reasons. Marshall fails to disclose at least one small coil having a plurality of connections, wherein the connections are interlinked by a *component mounted directly on or at the coil*, as required by claim 12. The Examiner relies on telecoil 12, ends 18 and 20, and substrate 16 of Marshall as being equivalent to the claimed coil, connections, and component, respectively. However, in Marshall, the substrate 16 is not mounted on or at the telecoil 12, as required by the present claims. Instead, the telecoil 12 is joined to a top of an integrated circuit 14 and the integrated circuit 14 is then connected to a top surface of the substrate 16. As held by the Federal Circuit, the prior art reference must disclose each element of the claimed invention arranged as in the claim. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 732 F.2d 1452, 221 USPQ 481, 185 (Fed. Cir. 1984). Thus, even if the prior art reference includes all the claimed elements, if the arrangement of the claimed elements is different from the arrangement of the prior art elements, anticipation cannot be found.

Marshall further fails to disclose the component comprising connecting pads for connecting the coil connections to further connections, as recited in independent claim 12. The Examiner relies on electrical connections referred to in paragraph [0058] of Marshall as being equivalent to the claimed connecting pads. However, as stated in Marshall, the electrical connections are on the substrate and "are made as one skilled in the art would know, such as soldering, welding, wire bonds, conductive adhesives, etched or screen printed traces." (See paragraph [0059] of Marshall) None of these examples are equivalent to the claimed connecting pads. Accordingly, the claimed connecting pads are missing from the Marshall reference.

Regarding claim 14, Marshall fails to disclose a plate, wherein the connecting pads are operatively attached to the plate. The electrical connections relied upon by the Examiner as

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being equivalent to the claimed connecting pads, are printed or otherwise attached directly to the substrate. It is unclear whether the Examiner considers the terminals 22 of the integrated circuit 14 as being equivalent to the claimed plate or to the claimed external connections. It is submitted that integrated circuit terminals cannot reasonably be considered equivalent to a plate upon which connecting pads are attached. Accordingly, Marshall also fails to disclose the claimed plate.

Regarding claim 23, Marshall fails to disclose a method including: providing a coil having a plurality of connections, a coil body, a plate, and connection pads operatively connected to the plate; and interlinking the plurality of connections by a component. The Examiner relies on substrate 16 of Marshall as being equivalent to both the claimed plate and the claimed component. Because the claimed plate and component are two separate structures recited in claim 23, the Examiner must point to two separate structures in Marshall; one that corresponds to the claimed plate; and another that corresponds to the claimed component. Otherwise, Marshall fails to disclose each element of the claim.

Because Marshall fails to disclose each and every element as set forth in claims 12, 14, 23, and 24, Marshall cannot anticipate such claims. Claim 13 has been cancelled herein. Withdrawal of this rejection is respectfully requested.

Claims 15, 16, 20 and 21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Marshall. Traversal of this rejection is made for at least the following reasons. Claims 15, 16, 20, and 21 depend from claim 1, which is believed to be allowable over Marshall for at least the reasons discussed above. Accordingly, claims 15, 16, 20, and 21 are also believed to be allowable over Marshall. Withdrawal of this rejection is respectfully requested.

Claim 22 was rejected under 35 U.S.C. 103(a) as being unpatentable over Marshall as applied to claim 12 above, and further in view of Julstrom et al. (U.S. Patent No. 6,694,034). Traversal of this rejection is made for at least the following reasons. Claim 22 depends from claim 1, which is believed to be allowable over Marshall for at least the reasons discussed above. Julstrom fails to make up for the aforementioned deficiencies of Marshall. Specifically, Julstrom fails to disclose, teach, or suggest a component mounted directly on or at a coil, connecting pads for connecting coil connections to further connections, and a plate coupled to the connecting pads. Accordingly, the combination of Marshall and Julstrom cannot render obvious claim 22 as

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the combination of Marshall and Julstrom fails to disclose, teach, or suggest each and every limitation set forth in claim 22. Withdrawal of this rejection is respectfully requested.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any fees required by this communication, please charge such fees to our Deposit Account No. 16-0820, Order No. 36613.

Respectfully submitted,
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